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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,) No. CR 11-0146 SBA
Plaintiff,)
v.)
JUDY RAE JARVIS,)
Defendant.)
)
**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STATUS
CONFERENCE TO SEPTEMBER 10,
2013 AND TO EXCLUDE TIME**

20 The parties are scheduled to appear before the duty magistrate for a status conference on
21 July 16, 2013. The parties have previously requested additional time to allow the defense to
22 review and investigate discovery and produce discovery to the government related to possible
23 additional tax charges committed by the defendant. The defense produced additional discovery
24 to the government, and the government has almost completed its review and additional
25 investigation into the matters covered by the defense discovery, including conducting interviews.
26 However, the government needs additional time to complete this process. For this reason, with
27 the agreement of counsel for both parties and the defendant, the parties now stipulate and ask the
28 Court to find and hold as follows:

**ORDER CONTINUING STATUS AND EXCLUDING TIME
CR 11-0146 SBA**

1 1. This matter shall be set for a status conference before the duty magistrate on
2 September 10, 2013 at 9:30 a.m.
3 2. The parties agree to an exclusion of time under the Speedy Trial Act, 18 U.S.C.
4 § 3161, from July 16, 2013, to September 10, 2013. Failure to grant the requested continuance
5 would unreasonably deny defense counsel and government reasonable time necessary for
6 effective preparation, taking into account the exercise of due diligence and the need for defense
7 counsel and government counsel to review discovery and conduct investigation related to
8 potential tax fraud charges the government may seek in an anticipated superseding indictment.

9 3. Given these circumstances, the Court finds that the ends of justice served by excluding
10 the period from July 16, 2013, to September 10, 2013, outweigh the best interest of the public
11 and the defendant in a speedy trial and filing of an indictment or information. 18 U.S.C.
12 § 3161(h)(7)(A).

13 4. Accordingly, and with the consent of the defendant, the Court orders that the period
14 from July 16, 2013, to September 10, 2013, be excluded from Speedy Trial Act calculations
15 under 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

16
17 IT IS SO STIPULATED.

18
19 DATED: July 11, 2013

/s/
DEBORAH G. LEVINE
Counsel for Judy Rae Jarvis

20
21 DATED: July 11, 2013

/s/
BRIAN C. LEWIS
Assistant United States Attorney

22
23 IT IS SO ORDERED.

24
25 DATED: 7/15/13

Kandis Westmore
KANDIS A. WESTMORE
United States Magistrate Judge